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May 15, 2001

Kim Ogle, RCRA Project Manager
United States EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

**Re: May 15, 2001 Progress Report
J. H. Baxter Arlington Facility
Docket No. RCRA-10-2001-0086
7026-04**

Dear Ms. Ogle:

This letter provides the first progress report for work completed under the Administrative Order on Consent (AOC) for the J. H. Baxter facility. In accordance with Paragraph 71 of the AOC, which took effect on April 30, 2001, this report is due on the 15th of every month. The Progress Report is to describe:

- All significant developments during the reporting period, including actions performed and any problems encountered relative to work required by the Order;
- Developments anticipated during the next reporting period including a schedule of actions to be performed;
- Anticipated problems, and planned resolution of past or anticipated problems; and
- Any other information relevant to the Order including results of any sampling or testing completed within the reporting period.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

- The Order was signed on April 30, 2001, beginning the schedule for Work Plan submittals.
- The Names, Titles, and Qualifications package was submitted to EPA by May 7, 2001 per Paragraph 49 of the AOC.

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EPA
May 15, 2001

7026-04
Page 2

- The Drinking Water Sampling and Alternate Water Supply Work Plan is being submitted per the 15-day requirement of Paragraph 51 of the AOC.
- All other Work Plans are under development and planned for submittal per the AOC requirements. A schedule of the planned deliverables is attached to this letter.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

- The Excess Stormwater Management Plan is planned for submittal to EPA on May 30, 2001, per Paragraph 50 of the AOC.
- The Facility Investigation Plan is planned for submittal to EPA on June 14, 2001.

ANTICIPATED PROBLEMS AND PROBLEM RESOLUTION

There are no past or anticipated problems at this time.

OTHER INFORMATION

Sampling and analysis was conducted in March and April under the Department of Ecology State Waste Discharge Permit. The data collection included:

- The second round of lysimeter sampling;
- Stormwater sampling in the untreated wood storage area from discrete drains formerly sampled as composites; and
- Sampling of the groundwater wells on quarterly and semi-annual schedules.

The chemical data have not yet been reviewed or validated; however, we anticipate receiving and reviewing these data in time for inclusion in the Facility Investigation Report and the associated comprehensive stand alone data document (per Attachment B, Section C of the AOC) to be submitted on June 14, 2001.



EPA
May 15, 2001

7026-04
Page 3

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC and provides an acceptable outline for future reports. Please let us know if you have any questions or comments on the work conducted to date or contents of this progress report.

Sincerely,

HART CROWSER, INC.

LORI HERMAN

Principal Hydrogeologist

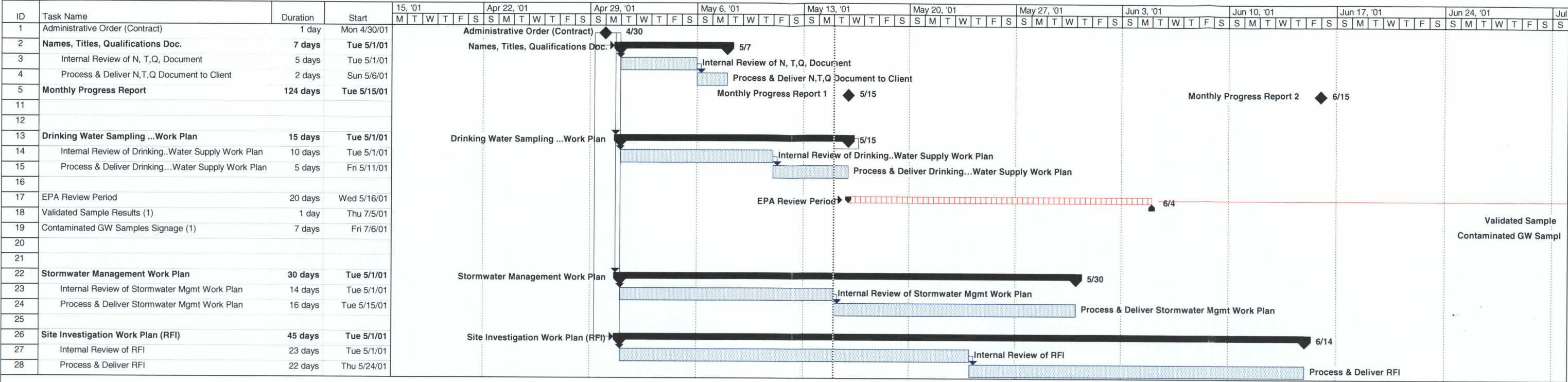
F:\docs\jobs\702604\Progress Letter 5-15-01.doc

Attachments: J. H. Baxter Arlington Facility Deliverables Schedule

cc: Georgia Baxter, J. H. Baxter
Sara Beth Watson, Steptoe and Johnson

J.H. Baxter - Arlington Facility
Deliverables Schedule

Project Manager: Lori Herman



Project: Baxter - Arlington
Date: March 15, 2001 (Revised)

Task
Split

Progress
Milestone

Summary
Rolled Up Task

Rolled Up Split
Rolled Up Milestone

Project Summary
External Tasks

Deadline
External Milestone

J.H. Baxter - Arlington Facility Deliverables Schedule

Project Manager: Lori Herman

ID	Task Name	Duration	Start
1	Administrative Order (Contract)	1 day	Mon 4/30/01
2	Names, Titles, Qualifications Doc.	7 days	Tue 5/1/01
3	Internal Review of N, T,Q, Document	5 days	Tue 5/1/01
4	Process & Deliver N,T,Q Document to Client	2 days	Sun 5/6/01
5	Monthly Progress Report	124 days	Tue 5/15/01
11			
12			
13	Drinking Water Sampling ...Work Plan	15 days	Tue 5/1/01
14	Internal Review of Drinking..Water Supply Work Plan	10 days	Tue 5/1/01
15	Process & Deliver Drinking...Water Supply Work Plan	5 days	Fri 5/11/01
16			
17	EPA Review Period	20 days	Wed 5/16/01
18	Validated Sample Results (1)	1 day	Thu 7/5/01
19	Contaminated GW Samples Signage (1)	7 days	Fri 7/6/01
20			
21			
22	Stormwater Management Work Plan	30 days	Tue 5/1/01
23	Internal Review of Stormwater Mgmt Work Plan	14 days	Tue 5/1/01
24	Process & Deliver Stormwater Mgmt Work Plan	16 days	Tue 5/15/01
25			
26	Site Investigation Work Plan (RFI)	45 days	Tue 5/1/01
27	Internal Review of RFI	23 days	Tue 5/1/01
28	Process & Deliver RFI	22 days	Thu 5/24/01

Task



Progress



Summary



Rolled Up Split

Rolled Up Progress



Project Summary



Deadline

